

# MEMO ENDORSED



CRUMILLER P.C.

June 17, 2021

**VIA ECF**

U.S. Magistrate Judge Barbara Moses  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Rm. 740  
New York, NY 10007

RE: Julie Small v. Merrick B. Garland  
18 - CV- 5659 (BCM)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 6/21/21

Dear Magistrate Judge Moses:

This law firm represents the Plaintiff, Julie Small, and with the consent of Defendant's counsel, I request that the date for the filing of the proposed Joint Pretrial Order be extended by two weeks, from June 28, 2021 to July 12, 2021. This is the second request to extend the filing date for the JTPO. On April 23, 2021, the parties jointly requested an extension in order to pursue settlement negotiations. (Dkt. No. 74). Your Honor granted the application and referred the matter to Magistrate Judge Aaron for a settlement conference. (Dkt. Nos. 74, 78). At the settlement conference, held May 28, 2021, the parties were unable to settle the case, and Your Honor ordered that the JTPO be filed on June 28, 2021 and a trial scheduling conference held on July 6, 2021. (Dkt. No. 78).

The reason for my request for an extension of the proposed JTPO is that important family obligations have arisen leaving me not enough time to prepare the necessary papers. Counsel are available for a trial scheduling conference any time the week of July 19, 2021 except for the morning of July 23, 2021.

Thank you for your consideration of this request.

APPLICATION GRANTED. The proposed joint pretrial order is due no later than **July 12, 2021**. The July 6, 2021 trial scheduling conference is adjourned to **July 20, 2021 at 10:00 a.m.**, in Courtroom 20A of the Daniel Patrick Moynihan United States Courthouse. This is an in-person proceeding. Counsel are advised to consult the Chief Judge's current entry protocols, available at <https://nysd.uscourts.gov/covid-19-coronavirus>, in advance of the conference. At the conference, counsel should be prepared to propose a schedule for any limine motions and for the submission of voir dire questions, requests to charge, a verdict sheet, and exhibit binders, in anticipation of a November 1, 2021 trial date. SO ORDERED.

Respectfully submitted,

/s/ John A. Beranbaum  
John A. Beranbaum

  
Barbara Moses  
United States Magistrate Judge  
June 21, 2021